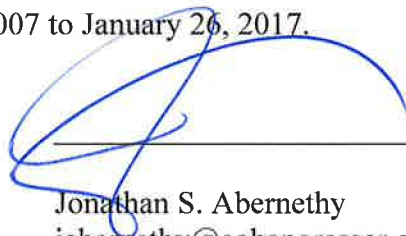


1. I am a partner at Cohen & Gresser LLP, counsel for defendant Vanja Baros in the above-captioned case. I respectfully submit this declaration in support of Baros's motion to dismiss the Amended Complaint.

2. Annexed hereto as Exhibit 1 is a true and correct copy of records produced to Baros by U.S. Customs and Border Protection, along with the email accompanying the production, in response to a subpoena for records of all of Baros's border crossings into and out of the United States for the period from January 1, 2007 to January 26, 2017. Baros redacted date of birth and passport number (referred to as "Document Number") information on these records pursuant to Federal Rule of Civil Procedure 5.2 and the Court's Order Regarding Discovery Materials. The remaining redactions were made by U.S. Customs and Border Protection.

3. Annexed hereto as Exhibit 2 is a true and correct copy of a subpoena to U.S. Customs and Border Protection for records of all of Baros's border crossings into and out of the United States for the period from January 1, 2007 to January 26, 2017.

Dated: June 27, 2017
New York, New York



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